

# Sage Legal LLC

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June 20, 2025

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Ramon E. Reyes, Jr., U.S.D.J.  
225 Cadman Plaza East  
Courtroom 2E North  
Brooklyn, NY 11201-1804

***Re:   Abaev v. Centene Management Company, LLC***  
**Case No.: 1:25-cv-1511 (RER) (VMS)**

Dear Judge Reyes:

This office represents the Plaintiff Iris Abaev (hereinafter “Plaintiff” or “Abaev”) in the above-referenced case. Plaintiff respectfully submits this letter in response to Defendant Centene Management Company, LLC’s (hereinafter “Defendant”) letter motion for a pre-motion conference.

While Plaintiff agrees, upon review of Defendant’s letter motion, that her federal claims are time-barred, the state law claims fall within the relevant statute of limitations period.

This is because in response to the COVID–19 pandemic, then Governor Andrew Cuomo issued executive orders establishing a toll “of the filing deadlines applicable to litigation in New York courts,” which was in effect “between March 20, 2020, and November 3, 2020.” See Baker v. 40 Wall St. Holdings Corp., 226 A.D.3d 637, 638 (2d Dept. 2024) (internal quotation marks omitted); see also 9 NYCRR §§ 8.202.8, 8.202.67; Brash v. Richards, 195 A.D.3d 582, 582 (2d Dept. 2021).

As a practical matter, the toll served to extend the statute of limitations period for causes of action that accrued prior to the tolling period, and which would have expired within that period, by 228 days from the original deadline. See Baker, 226 A.D.3d at 638; cf. Cruz v. Guaba, 226 A.D.3d 964, 965 (2d Dept. 2024).

Further, as Defendants concede, Plaintiff’s NYSHRL and NYCHRL claims are tolled pending the period of time the EEOC had Plaintiff’s charge.

Plaintiff will thus meet-and-confer with Defendant concerning an appropriate resolution in light of the foregoing circumstances.

Dated: Jamaica, New York  
June 20, 2025

Respectfully submitted,

**SAGE LEGAL LLC**

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